

DOCUMENT RESUME

ED 324 362

TM 015 628

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TITLE Testimony by Mark W. Plant, Deputy Under Secretary,
before the U.S. House Subcommittee on Census and
Population.
INSTITUTION Department of Commerce, Washington, D.C.
PUB DATE 8 Aug 90
NOTE 6p.
PUB TYPE Legal/Legislative/Regulatory Materials (C90)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Census Figures; *Decision Making; Error of
Measurement; National Surveys; *Policy Formation;
Public Policy; *Quality Control; Statistical
Analysis
IDENTIFIERS *Census 1990; Data Management

ABSTRACT

The development of information for adjustment of the 1990 decennial census conducted by the U.S. Department of Commerce is discussed. Policy guidelines for the adjustment decision, which have been the subject of litigation, as well as technical operational plans are outlined. These plans include projects to evaluate the matching process, the effects of missing data, the sensitivities of any proposed adjustment to statistical assumptions, and the quality of small area data. Associated methods of demographic analysis are discussed briefly, as is the role of the Undercount Research Steering Committee. (TJH)

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**TESTIMONY BY MARK W. PLANT, DEPUTY UNDER SECRETARY,
BEFORE THE U. S. HOUSE SUBCOMMITTEE
ON CENSUS AND POPULATION**

AUGUST 8, 1990

Mr. Chairman, members of the Committee, I would like to thank you for the opportunity to speak today. It is a pleasure to be here with the other members of the Economics and Statistics Administration team who have a role in the decennial census. To have the responsibility for statistical policy across the Economics and Statistics Administration is both a challenge and rare opportunity, especially with the President's commitment to improving the United States statistical system. But, of all my responsibilities, the task of gathering the information necessary for the Secretary to make his decision whether or not to adjust the 1990 census must take precedence. All of us recognize the importance of that decision, but few recognize the extent of the work leading to that decision and the complexity of the statistical policy issues involved in that decision. Mr. Chairman, the Department of Commerce is committed to a full, fair and accurate census and that includes a high-quality post-enumeration survey, a thorough evaluation of the quality of the census and the PES, and an even-handed examination of whether or not the census should be adjusted. The time frame for accomplishing all that work is extremely tight.

We have repeatedly said that there is only a 50:50 chance that enough information will be available to allow a possible adjustment of the census by July 15, 1991. That in no way reflects a lack of willingness on the part of the Department to consider adjustment -- rather it reflects the concern of all of the Economics and Statistics Administration with the quality of data -- in particular the decennial census data on which the quality of many statistics rest.

I would like to review briefly our progress towards making the adjustment decision. As you know, the stipulation and order signed by plaintiffs and defendants in the lawsuit required the Department to publish guidelines that articulate what they "believe to be the technical and nontechnical statistical and policy grounds for [the] decision." After the publication of preliminary guidelines in December of last year, we received extensive comments and published substantially revised final guidelines in March of this year. Plaintiffs challenged those guidelines but the court upheld them as being valid. Let me quote Judge McLaughlin here:

Although plaintiffs interpret the guidelines as biased against adjustment, the Court does not view them that way. The Stipulation itself is not perfectly neutral, and that lack of neutrality sometimes works in the plaintiffs' favor.... The ultimate decision on whether to adjust, of course, must be fresh and unbiased, following the Secretary's de novo review of the record. That good faith discretion, I am convinced is preserved under the guidelines.

He goes on to say:

I find most troublesome plaintiffs' third and final objection, that the guidelines allow the Secretary to rely on impermissible factors in making the critical decision on adjustment. It is more accurate to say, however, that the guidelines list valid factors for decision-making but that they are subject -- like any set of rules -- to being impermissibly contorted to justify a flawed final decision.

Plaintiffs' protection against such anticipated abuse is the added requirement under the Stipulation that defendants fully explain a decision not to adjust. Because defendants have chosen to contribute adequate but minimal performance to satisfy their obligation at this stage, defendants clearly incur a heavier burden to explain why no adjustment was made in the event the Secretary elects to proceed with an actual enumeration.

Although we disagree with the characterization of our contribution as minimal, we understand our obligation to explain the Secretary's decision in the event he elects not to adjust the census.

Shortly after the guidelines were published in March, we published a Federal Register notice alerting the public that a set of technical operational plans were available for scrutiny. These plans outlined the Census Bureau data collection and investigatory activities to be undertaken to evaluate the 1990 decennial census and the post-enumeration survey. These plans were sent to the Special Advisory Panel and to your committee for review and comment. Besides outlining the use of the PES and demographic analysis, this document briefly describes 29 individual studies to be done to check the quality of the data and assess whether an adjustment would make the census more accurate. These plans include projects to evaluate the matching process, the effects of missing data, the sensitivities of any proposed adjustment to statistical assumptions and the quality of small area data. The demographic analysis being done for the 1990 census is innovative in several ways. For the first time the Census Bureau demographic experts will have error bounds on the various population estimates demographic analysis gives us based on the errors in sources. In addition they are taking a hard look at the accuracy of various administrative records and

other sources used in making demographic projections. In addition to Census efforts, and recognizing that many professionals not working for the government are knowledgeable about these matters, we have hired numerous experts from outside the Federal government to give us a fresh perspective on many facets of this complicated problem including the estimation of the effect illegal immigration on the Census, matching errors, and dual-system estimation. The staff at the Census Bureau have developed the details of their workplans, and are working closely with these consultants to be sure that their work will be helpful in assessing the accuracy of the decennial census.

There are regular meetings of the Undercount Research Steering Committee at the Census Bureau to make sure the work on adjustment-related activities is well-thought out, well-planned and well-executed. I continue to be impressed with the high quality work of the professional staff at the Census Bureau and their commitment to ensuring that the Secretary has every possible bit of information when it comes time for the adjustment decision. I cannot applaud these fine people enough.

We also included in the package of operational plans a detailed time table that showed when these operations would take place. If you look carefully at the schedule there is virtually no slack between now and July 15. I will work closely with Barbara Bryant to ensure the quality of the data gathered and the analyses done and, to the extent possible, to complete these tasks on time.

We also look forward to the continued support of, and advice from, the Secretary's Special Advisory Panel. All members of the panel have been active in their roles as investigators and advisors. Several have communicated with Director Bryant, with Under Secretary Darby and with me their suggestions, concerns and even congratulations on the progress of the decennial census. The panel will play a crucial role in ensuring that the Secretary hears all sides of the adjustment issue before he makes his decision. We will continue to work with the panel as they carry out their important task.

Mr. Chairman, this extraordinary public policy decision will be made in the open. The mechanism put in place by the stipulation and order ensures that the basis for the Secretary's decision will be well known and explained. We look forward to working with the many individuals and groups concerned with the coverage of the 1990 census, especially this committee. To reiterate my earlier comments, the Economics and Statistics Administration is working on many fronts to improve the quality of the data we produce. In the next year, the quality of the decennial census will be the major focus of our efforts.

END

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Date Filmed

March 21, 1991